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10	UNITED STATES DISTRICT COURT		
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13	EASTERN DISTRICT OF CALIFORNIA		
14			
15	ARNOLD ABRERA,	No. 2:22-cv-01162 JAM DB	
16	plaintiff,	PLAINTIFF'S REQUEST FOR	
	V.	JUDICIAL NOTICE IN SUPPORT	
17		OF TO MOTION FOR	
18		PRELIMINARY INJUNCTION	
10	GAVIN NEWSOM, in his official	Constitutionality of State Statute	
19	capacity as Governor of the State of	Constitutionality of State Statute Challenge	
• •	California; ROB BONTA, in his official capacity as Attorney General of the State	Chancinge	
20	of California; ANNE MARIE	Date: January 9, 2024	
21	SCHUBERT, in her official capacity as	Time: 1:30 p.m.	
	County of Sacramento District Attorney;	Courtroom: 6	
22	COUNTY OF SACRAMENTO; BOBBY	Judge: The Honorable John A. Mendez	
23	DAVIS, in his official capacity as Chief of	Location: Courtroom 27, 8th floor	
23	the Elk Grove Police Department;	501 I Street	
24	JONATHAN P. HOBBS, in his official	Sacramento, CA	
۱ .	capacity as the City Attorney for the City	Trial Date: None Set Action Filed: July 5, 2022	
25	of Elk Grove; CITY OF ELK GROVE;	Action Filed. July 3, 2022	
26	defendants.		
	ucicidalits.		
27			
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REQUEST FOR JUDICIAL NOTICE

PLEASE TAKE NOTICE that on January 9, 2024, 1:30 p.m., before the Hon. Judge: The Honorable John A. Mendez, Courtroom 6, in the above-entitled court at 501 I Street, Sacramento, CA, Plaintiff Arnold Abrera, respectfully request that the Court take judicial notice of the public record and facts identified below, which are not subject to reasonable dispute, under Federal Rule of Evidence 201.

A fact is judicially noticeable when it is not subject to reasonable dispute and "can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned." Fed. R. Evid. 201(b)(2). Judicial notice is mandatory if "a party requests it" and the court is "supplied with the necessary information." Fed. R. Evid. 201(c)(2). Judicial notice may be taken at any stage of the proceeding. Fed. R. Evid. 201(d); *Papai v. Harbor Tug & Barge Co.*, 67 F.3d 203, 207 n.5 (9th Cir. 1995), *overruled on other grounds*, 520 U.S. 548 (1997).

This Court may take judicial notice of matters of public record, including court filings and orders from other cases. *Papai*, 67 F.3d at 207 n.5 (judicial notice may be taken of "decisions made by other courts or administrative agencies") (citations omitted); *DeHoog v. Anheuser-Busch InBev SA/NV*, 899 F.3d 758, 762 n.5 (9th Cir. 2018) (taking judicial notice of "government documents, court filings, press releases, and undisputed matters of public record"). "[T]he court can take judicial notice of 'public records and government documents available from reliable sources on the Internet, such as websites run by governmental agencies." *Romero v. Securus Technologies, Inc.*, 216 F. Supp. 3d 1078, 1084, n.1 (S.D. Cal. 2016) (internal citation omitted).

Here, Plaintiff respectfully request that this Court take judicial notice of the following court record and facts, which are not subject to reasonable dispute:

A true and correct copy of relevant portions of DECLARATION OF ARNOLD
 ABRERA IN SUPPORT OF MOTION FOR PRELIMINARY INJUNCTION with

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1	First Amended Complaint attached as Exhibit "1" in this case located at Docket	
2	entry 20 and filed on 10/20/22.	
3	2. Felony Complaint filed by Anne Marie Schubert, in her official capacity as County	
4	of Sacramento District Attorney, on March 18, 2021, captioned <i>People vs. Arnold</i>	
5	<i>Abrera</i> , Sacramento Superior Court case number 21FE004857, with arrest warrant	
6 7	was requested on or after January 29, 2021.	
8	3. Petition for Judicial Determination Re: Return of Firearms Welfare & Institutions	
9	Code section 8102 was filed by defendant Jonathan P. Hobbs as the City of Elk	
10	Grove Attorney, captioned <i>City of Elk Grove vs. Euginie Abrera</i> , Sacramento	
11		
12	Superior Court case number 34-2021-20000745.	
13		
14	Respectfully submitted, LAW OFFICES OF GARY W. GORSKI	
15	DATED: December 5, 2023 /s/ Gary W. Gorski GARY W. GORSKI	
16	Attorney for Plaintiff Arnold Abrera	
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